

AKIN GUMP STRAUSS HAUER & FELD LLP

AKIN GUMP STRAUSS HAUER & FELD LLP

Michael S. Stamer (*pro hac vice*)  
Ira S. Dizengoff (*pro hac vice*)  
David H. Botter (*pro hac vice*)  
Abid Qureshi (*pro hac vice*)  
One Bryant Park  
New York, New York 10036  
Telephone: (212) 872-1000  
Facsimile: (212) 872-1002  
Email: mstamer@akingump.com  
idizengoff@akingump.com  
dbotter@akingump.com  
aqureshi@akingump.com

Ashley Vinson Crawford (SBN 257246)  
580 California Street  
Suite 1500  
San Francisco, CA 94104  
Telephone: (415) 765-9500  
Facsimile: (415) 765-9501  
Email: avcrawford@akingump.com

*Counsel to the Ad Hoc Committee of Senior Unsecured  
Noteholders of Pacific Gas and Electric Company*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER OF THE AD HOC COMMITTEE  
OF SENIOR UNSECURED  
NOTEHOLDERS TO OBJECTION OF THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS TO DEBTORS' WILDFIRE  
ASSISTANCE MOTION**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

**Hearing**

Date: May 22, 2019

Time: 9:30 a.m. (Pacific Time)

Place: Courtroom 17

450 Golden Gate Ave, 16th Floor  
San Francisco, CA 94102

**Re:** Docket Nos. 1777, 2041

1 The Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company  
2 (the “Ad Hoc Committee”) in the above-captioned chapter 11 cases of Pacific Gas and Electric Company  
3 (the “Utility”) and PG&E Corporation (“PG&E” and, together with the Utility, the “Debtors”), by its  
4 undersigned counsel, Akin Gump Strauss Hauer & Feld LLP, hereby joins (the “Joinder”) the *Corrected*  
5 *Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C.*  
6 *§ 105(a) and 363(b) and Fed. R. Bankr. P. 2002 and 6004(h) for an Order (A) Authorizing Debtors to*  
7 *Establish and Fund Program to Assist Wildfire Claimants with Alternative Living Expenses and Other*  
8 *Urgent Needs (B) Granting Related Relief* [Docket. No. 2041] (the “UCC Objection”).<sup>1</sup> In support of  
9 the Joinder, the Ad Hoc Committee respectfully states the following:

#### 10 JOINDER

11 1. The Ad Hoc Committee joins the Official Committee of Unsecured Creditors (the  
12 “UCC”) in expressing its sympathy for the tragedy that the victims of the wildfires of 2017 and 2018  
13 have had to endure. The Ad Hoc Committee, however, joins in the UCC Objection and agrees with the  
14 UCC that the Program is flawed and, therefore, can only be approved if modified in accordance with the  
15 UCC Objection to the *Motion Pursuant to 11 U.S.C. §§ 105(a) and 363(b) and Fed. R. Bankr. P. 2002*  
16 *and 6004(h) for an Order (a) Authorizing Debtors to Establish and Fund Program to Assist Wildfire*  
17 *Claimants with Alternative Living Expenses and Other Urgent Needs and (b) Granting Related Relief*  
18 *(“Wildfire Assistance Program Motion”)* [Docket. No. 1777] (the “Motion”). In particular, the Ad Hoc  
19 Committee believes that the UCC’s concern that the Court “should remain mindful that it stands atop a  
20 slippery slope that very well may lead to additional ‘creeping confirmation’ requests,” UCC Objection  
21 ¶ 8, is particularly apt in light of the fact that several requests have already been made to either increase  
22 the amount of the Fund or make additional payments to different groups of plaintiffs.

23 2. Specifically, shortly before the filing of the UCC Objection, the Official Committee of  
24 Tort Claimants filed the *Official Committee of Tort Claimants’ Limited Joinder, Objection and Counter*  
25 *Motion to Debtors’ Wildfire Assistance Program Motion (Dkt. No. 1777)* [Docket No. 2013], requesting  
26 that the Fund be increased to at least \$250 million, with the option for the Administrator to seek  
27

---

28 <sup>1</sup> Capitalized terms used, but not defined, herein shall have the meanings ascribed to them in the UCC Objection.

1 additional amounts.<sup>2</sup> In addition, a group of wildfire claimants represented by the Singleton Law Firm  
2 (the “SLF Claimants”), filed the *Objection by the Singleton Law Firm Fire Victim Claimants to PG&E’s*  
3 *Exclusivity Motion (Doc. 1795)* [Docket No. 2019], requesting that the Court order the Debtors to resume  
4 a prepetition mediation system to begin immediately settling claims relating to the 2015 Butte Fire. The  
5 SLF Claimants estimate that remaining damages arising from that fire are between \$100 million and  
6 \$150 million.

7 3. The Ad Hoc Committee is prepared to sit down with all the major parties in interest prior  
8 to the hearing to discuss the implementation of a program to aid wildfire victims, with appropriate  
9 safeguards, as the UCC has suggested. Ultimately, as previously stated in the *Statement of the Ad Hoc*  
10 *Committee of Senior Unsecured Noteholders to Corrected Motion of Debtors Pursuant to 11 U.S.C. §*  
11 *1121(d) to Extend Exclusive Periods* [Docket No. 2008], and echoed by the sentiments expressed by  
12 Governor Newsom in the *Limited Objection of Governor Gavin Newsom to Corrected Motion of Debtors*  
13 *Pursuant to 11 U.S.C. § 1121 (d) to Extend Exclusive Periods* [Docket No. 2006], the Ad Hoc Committee  
14 believes that it is in the best interests of all stakeholders for all of the key parties in interest to turn their  
15 full attention to negotiating a confirmable plan of reorganization so that all creditors, including all  
16 wildfire victims with claims against the Debtors, can have their claims satisfied as quickly as possible.

#### 17 **RESERVATION OF RIGHTS**

18 4. The Ad Hoc Committee reserves the right to raise further and other objections to the  
19 Motion at the hearing as may be necessary or appropriate.

20  
21 [Remainder of page left intentionally blank]  
22  
23  
24  
25  
26

---

27 <sup>2</sup> The Ad Hoc Committee reserves its right to object to the Official Committee of Tort Claimant’s Counter Motion within  
28 the time period provided under the *Second Amended Order Implementing Certain Notice and Case Management*  
*Procedures* [Docket No. 1996] and the applicable local rules.

1  
2       **WHEREFORE**, for the foregoing reasons, the Ad Hoc Committee respectfully requests that the  
3 Court (i) sustain the UCC Objection and only grant the Motion to the extent modified as proposed by  
4 the UCC, and (ii) grant such other and further relief as is just, equitable and proper.  
5

6       Dated: May 16, 2019

7       **AKIN GUMP STRAUSS HAUER & FELD LLP**

8       By: 

9       David H. Botter (*pro hac vice*)

10       Michael S. Stamer (*pro hac vice*)

11       Ira S. Dizengoff (*pro hac vice*)

12       Abid Qureshi (*pro hac vice*)

13       Ashley Vinson Crawford (SBN 257246)

14         
15       *Counsel to the Ad Hoc Committee of Senior Unsecured*  
16       *Noteholders of Pacific Gas and Electric Company*  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28